



Michael B. Eisenkraft
(202) 408-4600
meisenkraft@cohenmilstein.com

September 12, 2017

Via ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street New York, NY 10007-1312

Re: *In re LIBOR-Based Financial Instruments Antitrust Litigation, 11-MD-2262 (NRB)*

Dear Judge Buchwald:

I am writing to inform the Court that Cohen Milstein Sellers & Toll, PLLC (“Cohen Milstein” or “Firm”) is adopting procedures to screen one of Your Honor’s former law clerks, Christopher Bateman, from any participation in the above-captioned litigation.

Mr. Bateman was Your Honor’s law clerk from September 2016 to August 2017. On September 25, 2017, he will become an associate at Cohen Milstein, which represents the Exchange-Based Plaintiffs in the above matter. I understand that, during his clerkship, Mr. Bateman was not primarily responsible for working on *In re Libor-Based Financial Instruments Antitrust Litigation*, No. 1:11-md-02262-NRB. Nevertheless, out of an abundance of caution, Cohen Milstein will screen Mr. Bateman from any involvement in that matter in accordance with Rule 1.12 of the New York Rules of Professional Conduct.

As part of this ethical screen, Mr. Bateman will not perform any work on the above matter. All Firm personnel will also be instructed not to discuss that matter with Mr. Bateman or to share any information relating to it. In addition, Mr. Bateman will be instructed not to divulge, to the Firm or any of its lawyers or other personnel, any information he learned during his clerkship about the above matter. Cohen Milstein will further ensure that Mr. Bateman does not have access to any folders pertaining to the above matter on the Firm’s content management system or any in-house or vendor-hosted document database that relates to that matter. A memorandum reflecting the firm’s procedures for screening Mr. Bateman will be shared by email with all Cohen Milstein personnel and will be posted on the Firm’s intranet so that it is viewable by all Firm employees at any time. Mr. Bateman will not share in any fees derived from the above matter.

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Respectfully submitted,

/s/ Michael B. Eisenkraft

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